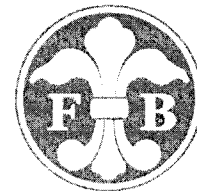


# FISHER & BYRIALSEN P.L.L.C



**MEMO ENDORSED**

USDC-SDNY

DOCUMENT

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DOC #:

DATE FILED JUN 04 2015

May 29, 2015

**VIA HAND DELIVERY**

Judge Ronnie Abrams  
United States District Judge  
40 Foley Square  
New York, New York 10007

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**RE: Jonathan Oliver: 14 Cr. 773 (RA)**

Your Honor:

I represent Mr. Oliver in the above referenced matter. On April 21, 2015 Mr. Oliver was remanded for failure to comply with some of the conditions of his pre-trial supervision. As Your Honor is aware these failures stem from Mr. Oliver's struggle with drug addiction. And as Your Honor has stated on the record, addiction is a disease and those afflicted with it like Mr. Oliver need treatment rather than incarceration.

Defense counsel has secured a bed at Day-Top for Mr. Oliver. Since Mr. Oliver relapsed after his last 30 day inpatient stay, Day-Top is requiring a 90 day extended stay for detox, rehabilitation, and counseling. Should Your Honor approve Mr. Oliver's release, it will be arranged for Mr. Oliver to be picked up from court and taken back to Day-Top.

It is therefore respectfully requested that Your Honor modify Mr. Oliver's bail condition to allow him to seek treatment outlined above.

Respectfully submitted,

/s/

David N. Fisher, Esq.  
FISHER, & BYRIALSEN PLLC

cc: Mr. Oliver  
Mr. Lerman  
AUSA Tehrani

The parties shall appear for a conference regarding this matter on  
June 8, 2015 at 5:00 p.m.

**SO ORDERED:**

HON. RONNIE ABRAMS  
UNITED STATES DISTRICT JUDGE

6/4/15